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18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK, NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR STRUCTURED ASSET
29 INVESTMENT LOAN TRUST
30 MORTGAGE PASS-THROUGH
31 CERTIFICATES, SERIES 2005-10,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00127-GMN-EJY

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND AND MOTION FOR FEES
AND COSTS**

(First Request)

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff U.S. Bank
2 National Association, as Trustee for Structured Asset Investment Loan Trust Mortgage Pass-
3 Through Certificates, Series 2005-10 (“U.S. Bank”) (collectively, the “Parties”), by and through
4 their counsel of record, hereby stipulate and agree as follows:

- 5 1. On January 22, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
6 Court, Case No. A-21-828245-C [ECF No. 1-1];
- 7 2. On January 24, 2021, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 8 3. On February 23, 2021, U.S. Bank filed a Motion for Remand [ECF No. 9];
- 9 4. On February 23, 2021, U.S. Bank filed a Motion for Costs and Fees [ECF No. 10];
- 10 5. Fidelity’s deadline to respond to U.S. Bank’s Motion for Remand and Motion for
11 Costs and Fees is currently March 9, 2021;
- 12 6. Fidelity’s counsel is requesting an extension until March 30, 2021, to file its response
13 to the pending Motion for Remand and Motion for Costs and Fees;
- 14 7. Fidelity requests a brief extension of time to respond to the Motion for Remand and
15 Motion for Costs and Fees to afford Fidelity additional time to respond to the legal
16 arguments set forth in U.S. Bank’s motions;
- 17 8. U.S. Bank does not oppose the requested extension;
- 18 9. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to U.S. Bank's Motion for
2 Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended through
3 and including March 30, 2021.

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5 Dated: March 8, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY

10
11 Dated: March 8, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair
13 KEVIN S. SINCLAIR
14 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY

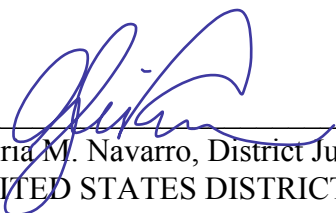
15 Dated: March 8, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Lindsay D. Robbins
17 LINDSAY D. ROBBINS
18 Attorneys for Plaintiff U.S. BANK BANK,
N.A.

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21 **IT IS SO ORDERED.**

22 Dated this 9 day of March, 2021

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25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

